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anti-Trinitarian purposes could be upheld. See *Att'y. Gen. v. Pearson*, 3 Mer. 353. But it has been established that a bequest promotive of "any doctrine of Christianity" is good. *Att'y Gen. v. Meeting-House*, 3 Gray (Mass.) 58. The rule has been generally laid down that there must be "nothing hostile to morality, religion, or law." See *George v. Braddock*, 45 N. J. Eq. 757; *Jones v. Watford*, 62 N. J. Eq. 339, 344. But nothing short of a repudiation of Christianity will invalidate. *Thornton v. Howe*, 31 Beav. 14; *Vidal v. Philadelphia*, 2 How. (U. S.) 127; see *Miller v. Gable*, 2 Den. (N. Y.) 492, 525. The holding of the principal case, though unique, is undoubtedly correct.

C. R. W.

EQUITY—DILIGENCE—FRAUD.—*SMITH v. ROGERS ET AL.*, 87 S. E. (GA.) 772.—The plaintiff, an invalid woman for years, was the victim of fraud practiced upon her by her brother-in-law and cousin, who took advantage of her confidence, illness, and ignorance of business. The brother-in-law obtained her signature to a deed to half her land, under pretense of seeing which could write the better hand. The cousin got her to sign a deed to the other half, under pretense of a lease of the whole tract to him, to terminate at her option. Held, that the plaintiff was so negligent in the execution of the instruments, that equity will not aid her by a cancellation of the deeds; and that the case was properly dismissed on demurrer. Evans, P. J., and Lumpkin, J., *dissenting*.

No grounds for the decision are given by the court. From the uncontroverted facts the defendants fraudulently deceived, tricked, and misled the plaintiff into signing the deeds. There is no class of cases where equity will allow a defrauder to set up negligence of his victim as a defense to his own fraud. Where there is fraud, equity will look upon any disability of plaintiff with unusual indulgence. *McIntire v. Pryor*, 173 U. S. 38; *Carter v. Tice*, 120 Ill. 277; *Harding v. Randall*, 15 Me. 332. And where one who occupies a confidential relation to another takes advantage of that relation by fraudulent misrepresentations to procure the execution of a deed, such deed may be cancelled. *White v. White*, 89 Ill. 460; *Lyons v. Van Riper*, 26 N. J. Eq. 337; *Bayne v. Whistler*, 4 Alaska 15. Laches cannot be set up as a bar to an action if delay is the result of fraud. *Kelley v. Boettcher*, 85 Fed. (Colo.) 55; *Wampler v. Wampler*, 30 Gratt. (Va.) 454; *Free v. Buckingham*, 57 N. H. 95. In no case will the statute of limitations run until plaintiff has knowledge of the fraud. *Brown v. Norman*, 55 Miss. 369; *Crowther v. Rowlandson*, 27 Cal. 376. The plaintiffs in cases similar to the principal cases have been held justified in relying on the representations of the supposed lessee, and failure to investigate, without grounds for suspicion, was held not to constitute laches. *McIntire v. Pryor*, and *Carter v. Tice*, *supra*. There are no rights of innocent third parties to consider in the principal case, and equity had only to deal with the immediate parties. One finds difficulty in sustaining the conclusion reached.

L. W. B.

JUDGMENT LIENS—PREFERENCE.—*HULBERT v. HULBERT ET AL.*, 101 N. E. (N. Y.) 70.—Where a judgment debtor inherited realty from his